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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 EQUAL EMPLOYMENT
11 OPPORTUNITY COMMISSION, *el al.*,

12 Plaintiffs,

13 v.

14 GEORGIA-PACIFIC CORRUGATED,
15 LLC,

16 Defendant.

Case No. C 07 3944 SBA

**STIPULATED REQUEST FOR
CONTINUANCE OF DISCOVERY
DEADLINES AND TRIAL CALENDAR**

17 Defendant Georgia-Pacific Corrugated (“G-P” or “Defendant”), Plaintiff Equal
18 Employment Opportunity Commission (“EEOC”), and Plaintiff/Intervenor Janet Stege (“Stege”)
19 hereby jointly and urgently request that this Court issue an Order continuing the discovery deadlines
20 and trial calendar for this case for not less than 60 days.

21 Pursuant to this Court’s order of August 4, 2008 (*see* Docket No. 61), the Parties met
22 for a settlement conference before Magistrate Wayne D. Brazil on August 7, 2008. In order to open
23 up their schedules to meet for this settlement conference, and in order to avoid incurring further
24 costs and attorneys’ fees (and thereby make settlement less likely), the Parties were forced to take
25 several previously-noticed depositions off calendar.

26 Taking these depositions off calendar proved to be a productive choice. Magistrate
27 Brazil summarized the significant progress made by the Parties on August 7, 2008 as follows: “2
28 good ideas (one from each side). Parties continue negotiations.” *See* Docket No. 62. After the

1 settlement conference, the Parties met for more than an hour in the witness rooms outside of the
2 Magistrate's courtroom.

3 The "2 good ideas" referenced by Magistrate Brazil represent substantial political,
4 monetary, and practical concessions from each of Plaintiff EEOC, Plaintiff/Intervenor Janet Stege,
5 and Defendant G-P. All Parties have indicated that these substantial concessions are possible *only* if
6 this case settles before trial. The Parties sincerely wish to build on the progress made in this
7 settlement conference and quickly to reach a settlement agreement.

8 However, because the current fact discovery deadline, September 2, 2008, is fast
9 approaching, this will only be possible with a continuance of discovery deadlines and the trial
10 calendar. The Parties have noticed (and then taken off calendar) several critical depositions, all of
11 which cannot possibly be completed before the current fact discovery cutoff. Further, the cost, both
12 in money and time, of conducting these depositions will make achieving settlement significantly less
13 likely.

14 The Parties have met three separate times in an attempt to reach settlement: (1) in an
15 ADR mediation conference on April 24, 2008; (2) in a several-hour meeting on July 17, 2008; and
16 (3) in the settlement conference before Magistrate Brazil. Each meeting has been more successful
17 than the prior one, and the Parties stand on the edge of reaching settlement. Because the discovery
18 cutoff date is fast approaching, the Parties request that Your Honor, the general duty judge, sign the
19 proposed order, filed concurrently herewith, in Judge Armstrong's absence.

20 SO STIPULATED:

21 I hereby attest that I have on file all holograph signatures for any signatures indicated
22 by a "conformed" signature (/S/) within this efiled document.

23 Date: August 8, 2008

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

26 /s/ Linda Ordonio-Dixon
27 Linda Ordonio-Dixon
28 Attorney for Plaintiff EEOC

1 Date: August 8, 2008

DICKSON – ROSS LLP

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3
4 /s/ Kathryn Burkett Dickson
Kathryn Burkett Dickson
5 Attorney for Plaintiff/Intervenor Janet Stege
6

7 Date: August 8, 2008

LITTLER MENDELSON, P.C.

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9 /s/ Margaret Hart Edwards
10 Margaret Hart Edwards
11 Attorney for Defendant Georgia-Pacific
Corrugated, LLC
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION, *et al.*,

Plaintiffs,

v.

GEORGIA-PACIFIC CORRUGATED,
LLC,

Defendant.

Case No. C 07 3944 SBA

**[PROPOSED] ORDER CONTINUING
DISCOVERY DEADLINES AND TRIAL
CALENDAR**

For good cause shown and pursuant to the Stipulation of the Parties that they have made significant progress toward a settlement, *inter alia*, through meeting with Magistrate Wayne D. Brazil on August 7, 2008 (*see* Docket No. 62), it is hereby ordered that all discovery deadlines be continued for 60 days. If a 60-day continuance would result in a deadline falling on a weekend, such deadline shall be set for the following Monday.

If this case has not yet settled, the parties shall appear via telephone on _____, 2008 for a case management conference in order to set a new trial date for this matter.

Date: _____

United States District Judge

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